

U.S. Department of Justice

*United States Attorney
Southern District of New York*

86 Chambers Street
New York, New York 10007

February 11, 2022

BY ECF

Hon. Barbara C. Moses
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

**Re: *Ylandre Smith Cash v. Kijakazi*
21 Civ. 01105-VSB-BCM**

Dear Judge Moses:

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 2/15/22

This Office represents the Commissioner of Social Security, defendant in the above-referenced action. We write respectfully, having received the consent of plaintiff's counsel, to request an adjournment of the Court's briefing schedule.

Pursuant to the Court's scheduling order, the defendant's cross-motion for judgment on the pleadings and opposition to plaintiff's motion for judgment on the pleadings is due on February 18, 2022, and plaintiff's opposition and reply, if any, is due on March 11, 2022. We write to respectfully request, however, that the briefing schedule in this case be adjourned as follows:

Action	Date
Government's opposition to plaintiff's motion for judgment on the pleadings and cross-motion for judgment on the pleadings	March 11, 2022
Plaintiff's opposition to Government's cross-motion and reply in support of her motion	April 1, 2022

This request is being made due to a recent escalation in the undersigned's workload. The twenty-one (21) day adjournment of the briefing schedule will allow me the time necessary to complete review of the record and briefing of the case, in line with my other assignments.

This is the Commissioner first request for an adjournment of the briefing schedule in this

case. Plaintiff previously requested an extension of time to file her pre-motion settlement proposal; the Commissioner consented; and the Court granted that request on September 16, 2021. On December 7, 2021, the Court, *sua sponte*, extended Plaintiff's time to move for judgment on the pleadings from December 1, 2021 to December 20, 2021.

We appreciate the Court's consideration of this request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney

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Application GRANTED. SO ORDERED.



Barbara Moses
United States Magistrate Judge
February 15, 2022

cc: Christopher Bowes, Esq.